

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC CLOPPER,

Plaintiff,

v.

HARVARD UNIVERSITY; PRESIDENT
AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION);
THE HARVARD CRIMSON; and JOHN
DOES 1-10,

Defendants.

No. 20-cv-11363-RGS

MOTION TO SUBMIT CERTAIN EXHIBITS UNDER SEAL

Defendant, President and Fellows of Harvard College (“Harvard” or the “University”), respectfully moves to file under seal three video file exhibits (Exhibits A, B, and C) in connection with Harvard’s Motion to Dismiss. As grounds for this motion, Harvard states that the video files contain nudity and potentially obscene matter that are not appropriate for filing on the public docket. Harvard will submit the three exhibits to the Court on a single compact disc.

Local Rule 7.1 Certification

Undersigned counsel hereby certifies that on September 28, 2020, he conferred with counsel for Plaintiff Eric Clopper concerning the request to seal. Counsel for Mr. Clopper indicated that he would not assent to impoundment.

Respectfully submitted,

**PRESIDENT AND FELLOWS
OF HARVARD COLLEGE**

By its attorneys,

/s/ William W. Fick
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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 28, 2020.

/s/ William W. Fick